

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

ELVIS MOODIE, RAYON FISHER,
DESMOND ELLIS, and
KEISHA COLLINS-ENNIS, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

KIAWAH ISLAND INN COMPANY, LLC,
d/b/a KIAWAH ISLAND GOLF RESORT,

Defendant.

Case No. 2:15-cv-01097-RMG

DECLARATION OF JAMES KNOEPP

1. I am the General Counsel and a Senior Supervising Attorney at the Southern Poverty Law Center and one of Plaintiffs' attorneys (and Class Counsel) in this matter. During the time period that is relevant for purposes of this motion I was the Deputy Legal Director and a Senior Supervising Attorney for the Southern Poverty Law Center's Immigrant Justice Project.

2. I am admitted to practice in the state courts of the Commonwealth of Virginia (currently on inactive status) and the states of Georgia and South Carolina, the federal courts of the Eastern and Western Districts of Virginia, the federal courts of the Northern and Middle Districts of Georgia, and the United States Court of Appeals for the Eighth, Ninth, and Eleventh Circuits. I earned my Juris Doctor Degree, *cum laude*, from Loyola of Los Angeles Law School in 1998, and was admitted to practice in the state of Florida the same year. I was admitted to practice in the Commonwealth of Virginia in 2001, the state of Georgia in 2009, and the state of South Carolina in 2016.

3. I currently serve as the Southern Poverty Law Center's General Counsel, where I have worked since July, 2008. I also work as a Senior Supervising Attorney in SPLC's Immigrant Justice Project. Prior to my employment at the Southern Poverty Law Center, I was

the Litigation Director for the Legal Aid Justice Center in Charlottesville, Virginia from 2006 until 2008. Between 2003 and 2006 I worked as a Staff Attorney and later as Legal Director of the Virginia Justice Center for Farm and Immigrant Workers, a project of the Legal Aid Justice Center. I have also worked as a Staff Attorney for the Virginia Farmworkers Legal Assistance Project from August 2000 to March 2002. Prior to that position I was a Skadden, Arps, Slate, Meagher, and Flom fellowship recipient where I worked with Florida Legal Services, Inc.'s Migrant Farmworker Justice Project in Belle Glade, Florida. I held that position from August 1998 to August 2000.

4. During my tenure with the Migrant Farmworker Justice Project, the Virginia Justice Center/Legal Aid Justice Center, and now with the Southern Poverty Law Center, I have represented thousands of clients in class action and other litigation.

5. During the course of this litigation, I have kept contemporaneous time records related to my work on this case. Those time records are recorded in SPLC's computerized document management and timekeeping software during the normal course and scope of my work. My time records related to this case are attached to this Declaration as Exhibit A.

6. The time records from our time-keeping system of the paralegal assigned to this case, Carmen Martinez, whom I was responsible for supervising, are attached as Exhibit B to this Declaration.

7. Based on my role as the most senior attorney at SPLC assigned to this case, I have reviewed all of the time records in SPLC's time keeping system related to this litigation. In the exercise of billing judgment, I eliminated some time spent by my SPLC colleagues. Those deletions are reflected in the time keeping charts that are attached to this Declaration in the case of me and Ms. Martinez, or to each person's individual declaration, in the case of Ms. Lapointe and Ms. Rich. I also did not include any time spent by me or Ms. Martinez answering numerous calls from class members related to the settlement, time spent locating and contacting class members who had not submitted claim forms, the bulk of my time spend on the attorneys' fees

motion, or the time I will spend traveling to and attending the upcoming hearing on the motion for final approval of the settlement.

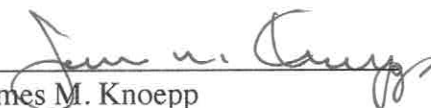
8. I have reviewed SPLC's accounting records related to expenditures on this litigation. In total, SPLC has incurred out-of-pocket expenses totaling \$33,013.11 related to this case.

9. I have used Settlement Services, Inc. to serve as a settlement administrator in two other class action settlements—*Rosiles-Perez v. Superior Forestry Services, Inc.*, Case No. 1:06-CV-006 (M.D. Tenn) (three separate distributions to approximately 1,600 class members), and *Perez-Benites v. Candy Brand, LLC*, Case No. 1:07-cv-01048-RTD (W.D. Ark.) (two separate distributions to approximately 725 class members). Based on my experience with Settlement Services' billing rates, my discussions with them, and my knowledge of the paperwork and time that will be necessary to properly process payments to the 231 claiming class members, I estimate that SPLC will spend approximately \$15,000 on settlement administration in this case.

10. My office filed an attorneys' fees petition in *Nunag-Tanedo v. E. Baton Rouge Parish Sch. Bd.*, Case No. 8:10-cv-01172-JAK-MLG. That case was pending before the United States District Court for the Central District of California in Los Angeles. In 2013 the court awarded attorneys' fees to the plaintiffs and based the award on a rate of \$500 per hour for my work on the case.

Pursuant to 28 U.S.C. § 1746 and under penalty of perjury, I declare that the foregoing facts are true and correct to the best of my knowledge.

Executed on December 5, 2016.


James M. Knoepp

Date	Description	Staff	Dur/Qty	Proposed Rate	Amount	Notes
2/1/2016	Second chair deposition of B. Perry Woodside III	Knoepp	4	\$0.00	\$0.00	Eliminated in the exercise of billing judgment
1/12/2016	Second chair deposition of Ken Tibbetts, including travel time to and from location	Knoepp	5	\$0.00	\$0.00	Eliminated in the exercise of billing judgment
1/18/2016	Travel time to SC for deposition of Jennifer Bozard	Knoepp	5.5	\$0.00	\$0.00	Eliminated in the exercise of billing judgment
1/19/2016	Travel time from hotel to J. Bozard deposition location	Knoepp	0.3	\$0.00	\$0.00	Eliminated in the exercise of billing judgment
1/19/2016	Travel time to Atlanta after deposition of J. Bozard	Knoepp	5.5	\$0.00	\$0.00	Eliminated in the exercise of billing judgment
1/19/2016	Second chair deposition of J. Bozard	Knoepp	8	\$0.00	\$0.00	Eliminated in the exercise of billing judgment
2/27/2015	Legal research on SCWPA fourth circuit decision	Knoepp	0.3	\$425.00	\$127.50	
2/27/2015	Phone call with Nancy Bloodgood, Michelle Lapointe, and Sarah Rich to discuss case and co-counsel relationship	Knoepp	0.3	\$425.00	\$127.50	
2/27/2015	very brief review of draft of complaint	Knoepp	0.3	\$425.00	\$127.50	
3/2/2015	Review and edit complaint	Knoepp	2.6	\$425.00	\$1,105.00	
3/4/2015	email Nancy Bloodgood with copy of draft Complaint for her review	Knoepp	0.1	\$425.00	\$42.50	
3/4/2015	Further revisions to complaint; research on SOL for claims involving federal wages	Knoepp	1.1	\$425.00	\$467.50	
3/5/2015	Further work on finalizing Complaint and related paperwork for filing	Knoepp	1.5	\$425.00	\$637.50	
3/6/2015	Final edits to complaint; send to co-counsel for filing	Knoepp	0.3	\$425.00	\$127.50	
3/6/2015	Meeting with Michelle Lapointe to discuss final edits to Complaint; call with co-counsel to discuss final changes; legal research on SCPWA	Knoepp	0.8	\$425.00	\$340.00	
3/6/2015	Final review of complaint and edits; send to local counsel for review	Knoepp	0.7	\$425.00	\$297.50	
3/11/2015	Review and edit Declaration of Elvis Moodle	Knoepp	0.2	\$425.00	\$85.00	
4/24/2015	Review, edit, and finalize FLSA collective action motion and Rule 23 class certification motion and exhibits	Knoepp	1.5	\$425.00	\$637.50	
4/29/2015	Meeting with Michelle Lapointe and Meredith Stewart to discuss legal arguments in response to MTD	Knoepp	0.5	\$425.00	\$212.50	
5/5/2015	Participate in Rule 26(f) conference	Knoepp	0.7	\$425.00	\$297.50	
5/5/2015	Meeting to prepare for Rule 26(f) conference	Knoepp	0.8	\$425.00	\$340.00	
5/7/2015	Review and edit response to Defendants' motion to dismiss	Knoepp	0.9	\$425.00	\$382.50	
5/8/2015	Review and edit response to Kiawah MTD; legal research re: same	Knoepp	2.2	\$425.00	\$935.00	
5/14/2015	Prepare FLSA notice filing for two opt-in Plaintiffs	Knoepp	0.2	\$425.00	\$85.00	
5/18/2015	Review Defendants' motion in opposition to class certification and FLSA collective action notice; discuss response with Michelle Lapointe	Knoepp	0.4	\$425.00	\$170.00	
5/20/2015	Prepare FLSA opt-in Notice for Albert Livingston	Knoepp	0.1	\$425.00	\$42.50	
7/1/2015	Review and provide edits and comments to Plaintiffs' first RFPs to defendants	Knoepp	0.4	\$425.00	\$170.00	
7/1/2015	Review and provide comments/edits to subpoena to Graybull Gardens	Knoepp	0.2	\$425.00	\$85.00	
7/22/2015	Meet with Sarah Rich and Michelle Lapointe to discuss review and processing of subpoena response from FLECTS	Knoepp	0.3	\$425.00	\$127.50	
7/28/2015	Phone call with C. Blackburn re format for exchanging discovery and list of names for FLSA notice	Knoepp	0.2	\$425.00	\$85.00	
7/29/2015	Read court's order related to FLSA collective action certification	Knoepp	0.2	\$425.00	\$85.00	
7/31/2015	Review and edit defendant's draft of confidentiality agreement/order	Knoepp	0.5	\$425.00	\$212.50	
8/5/2015	Brief review of some of the FLECTS subpoena response documents	Knoepp	0.3	\$425.00	\$127.50	
8/5/2015	Review information re JCLO involvement in employment of Jamaicans on H-2B visas at Kiawah and other locations; emails re subpoena to JCLO	Knoepp	0.3	\$425.00	\$127.50	
8/6/2015	Emails back and forth with opposing counsel regarding proposed confidentiality order	Knoepp	0.3	\$425.00	\$127.50	
8/7/2015	Email consultation with G. Schell re Jamaican addresses	Knoepp	0.1	\$425.00	\$42.50	
8/7/2015	Discussion with S. Rich re defendant's positions with respect to certain aspects of proposed confidentiality order	Knoepp	0.2	\$425.00	\$85.00	
8/7/2015	Review of 2013 names and addresses of potential opt-ins; email to opposing counsel re missing names	Knoepp	0.3	\$425.00	\$127.50	
8/7/2015	Phone call with M. Cherry to discuss issues related to proposed confidentiality order and production of names/addresses	Knoepp	0.2	\$425.00	\$85.00	
8/10/2015	Email to defendant's counsel confirming conversation re confidentiality order	Knoepp	0.2	\$425.00	\$85.00	
8/10/2015	Phone call with C. Blackburn re providing discovery responses and confidentiality order	Knoepp	0.2	\$425.00	\$85.00	
8/11/2015	Brief review of Defendant's answers to first set of interrogatories	Knoepp	0.2	\$425.00	\$85.00	
8/11/2015	Review and load FLECTS documents for purposes of production to Defendant	Knoepp	0.1	\$425.00	\$42.50	
8/18/2015	Working with J. Roberts regarding production of documents to Defendant in response to RFPs	Knoepp	0.4	\$425.00	\$170.00	
8/18/2015	Review Plaintiffs' documents for purposes of responding to RFPs from Defendant	Knoepp	0.2	\$425.00	\$85.00	
8/18/2015	Consult with M. Lapointe re damages and interrogatory responses	Knoepp	0.2	\$425.00	\$85.00	
8/18/2015	Emails with N. Bloodgood re damages under SCPWA claim	Knoepp	0.2	\$425.00	\$85.00	
8/19/2015	Review, edit, and provide comments to draft of response to First Interrogatories and RFPs	Knoepp	0.7	\$425.00	\$297.50	
8/19/2015	Team meeting with S. Rich, M. Lapointe, and C. Martinez to discuss responding to Defendant's discovery requests; report back on my call with Cherie; discussion of additional documents needed from FLECTS related to costs of providing transportation	Knoepp	0.8	\$425.00	\$340.00	
8/19/2015	Meet with S. Rich to go over how to code documents as responsive or non-responsive to Defendant's RFPs	Knoepp	0.1	\$425.00	\$42.50	
8/19/2015	Phone call with C. Blackburn re: discovery deficiencies in documents Defendant produced last week	Knoepp	0.3	\$425.00	\$127.50	
8/23/2015	Document review of documents produced by Defendants	Knoepp	1.5	\$425.00	\$637.50	

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PLAINTIFF'S
EXHIBIT

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Date	Description	Staff	Dur/Qty	Proposed Rate	Amount	Notes
8/24/2015	Further review of Defendant's ETA submissions and discussion with M. Lapointe re same	Knoepp	0.5	\$425.00	\$212.50	
8/24/2015	Review Court's decision on class certification and discuss with M. Lapointe	Knoepp	0.4	\$425.00	\$170.00	
8/25/2015	Review new FLSA opt-in filing; send to N. Bloodgood for filing	Knoepp	0.1	\$425.00	\$42.50	
8/25/2015	Review legal research on privilege related to production of income tax returns; respond to email from S. Rich re same	Knoepp	0.3	\$425.00	\$127.50	
8/25/2015	Review additional documents provided by Plaintiffs; send email to team re same	Knoepp	0.2	\$425.00	\$85.00	
8/25/2015	Reviewing documents to produce to Defendants; working with J. Roberts on responding to RFPs	Knoepp	1	\$425.00	\$425.00	
9/9/2015	Brief document review of documents produced by Kiawah related to payroll	Knoepp	0.5	\$425.00	\$212.50	
9/9/2015	Discussion with M. Lapointe about preparing privilege log	Knoepp	0.2	\$425.00	\$85.00	
9/9/2015	Review and provide edits on draft of amended complaint	Knoepp	0.4	\$425.00	\$170.00	
9/9/2015	Meeting with M. Lapointe to discuss amendments to complaint and potential claims related to housing charges and transportation charges	Knoepp	0.2	\$425.00	\$85.00	
9/14/2015	Review privilege log draft prepared by M. Lapointe	Knoepp	0.2	\$425.00	\$85.00	
9/14/2015	Phone call with Cherie Blackburn to discuss outstanding discovery issues and amendment to complaint	Knoepp	0.3	\$425.00	\$127.50	
9/15/2015	Review documents produced by Defendants; analyze housing charges	Knoepp	4	\$425.00	\$1,700.00	
9/22/2015	Phone call from C. Blackburn re: our motion to amend complaint; supplemental discovery responses, and streamlining case	Knoepp	0.2	\$425.00	\$85.00	
9/22/2015	Conversation with S. Rich about phone call with C. Blackburn re streamlining case and number of class members	Knoepp	0.3	\$425.00	\$127.50	
9/27/2015	Review documents related to opt-ins and class members produced by Defendant	Knoepp	2	\$425.00	\$850.00	
9/28/2015	Review documents related to opt-ins and class members produced by Defendant	Knoepp	1.2	\$425.00	\$510.00	
10/27/2015	Document review related to deposition prep for four plaintiffs on 11.2.2015	Knoepp	1.3	\$425.00	\$552.50	
10/29/2015	Document review related to 3(m) violations	Knoepp	1.4	\$425.00	\$595.00	
10/30/2015	Document review and 3(m) analysis regarding housing costs; damages computations to determine if 3(m) violations	Knoepp	3.2	\$425.00	\$1,360.00	
11/1/2015	Review and process for production of Elvis Moodie 2014 tax returns; email to C. Blackburn	Knoepp	0.3	\$425.00	\$127.50	
11/1/2015	Travel time to/from meeting with clients for deposition prep session (from hotel)	Knoepp	0.2	\$425.00	\$85.00	
11/1/2015	Meet with two class members from the Philippines to discuss case and claims	Knoepp	0.2	\$425.00	\$85.00	
11/1/2015	Meeting and deposition preparation with four clients	Knoepp	2	\$425.00	\$850.00	
11/1/2015	Travel time to Charleston for depositions of four clients	Knoepp	5.5	\$425.00	\$2,337.50	
11/2/2015	Travel time to return to Atlanta following four client depositions in Charleston	Knoepp	5.5	\$425.00	\$2,337.50	
11/2/2015	Meeting with C. Blackburn following depositions to discuss discovery issues and week payroll issues	Knoepp	0.4	\$425.00	\$170.00	
11/2/2015	Travel time from hotel to pick up clients and travel to deposition location	Knoepp	0.6	\$425.00	\$255.00	
11/2/2015	Depositions of four clients	Knoepp	5.5	\$425.00	\$2,337.50	
11/3/2015	Document review of apartment lease information and pricing	Knoepp	1.8	\$425.00	\$765.00	
11/3/2015	Emails to and from C. Blackburn re discovery issues	Knoepp	0.2	\$425.00	\$85.00	
11/3/2015	Review class notice approved by court and discuss mailing with S. Rich; contact accounting re Action in Mailing to provide services to complete mailing	Knoepp	0.2	\$425.00	\$85.00	
11/9/2015	Initial brief review of internal Kiawah emails produced by Defendant today	Knoepp	0.2	\$425.00	\$85.00	
11/9/2015	Email to G. Wallington re production of Kiawah emails and load file	Knoepp	0.1	\$425.00	\$42.50	
11/9/2015	Email to C. Blackburn with list of data fields that are needed for weekly payroll production	Knoepp	0.1	\$425.00	\$42.50	
11/9/2015	Discussion with S. Rich re depositions of Kiawah personnel and preparing topics for 30(b)(6) notice	Knoepp	0.2	\$425.00	\$85.00	
11/9/2015	Review Plaintiff documents and prepare second supplemental production; send to defendant	Knoepp	0.8	\$425.00	\$340.00	
11/10/2015	Discussion with S. Rich re preparing for depositions following call with C. Blackburn	Knoepp	0.2	\$425.00	\$85.00	
11/10/2015	Reviewing emails produced by Defendant	Knoepp	4.5	\$425.00	\$1,912.50	
11/10/2015	Phone call from C. Blackburn re workweek payroll records, discovery issues, potential settlement and computation of damages	Knoepp	0.4	\$425.00	\$170.00	
11/11/2015	Download and begin processing and reviewing new set of emails from Defendant to replace others that were mis-numbered	Knoepp	0.6	\$425.00	\$255.00	
11/12/2015	Review documents and analyze damages for named and opt-in plaintiffs	Knoepp	4.3	\$425.00	\$1,827.50	
11/16/2015	Emails with opposing counsel regarding new production of emails and issues	Knoepp	0.2	\$425.00	\$85.00	
11/16/2015	Analysis of SPWD violations and damages	Knoepp	2.5	\$425.00	\$1,062.50	
11/17/2015	Meeting with S. Rich, M. Lapointe, C. Martinez to discuss deposition scheduling, discovery responses from Defendant, reviewing emails produced by Defendant, potential settlement, legal research needs re: FLSA claims	Knoepp	1	\$425.00	\$425.00	
11/18/2015	Kiawah email document review	Knoepp	5.8	\$425.00	\$2,465.00	
11/18/2015	Call with C. Blackburn re: payroll records	Knoepp	0.2	\$425.00	\$85.00	
11/18/2015	Meeting with M. Lapointe and S. Rich to discuss revised deposition plan, extending discovery, likely SJ motion from defendant	Knoepp	0.5	\$425.00	\$212.50	
11/19/2015	Discuss depo scheduling with M. Lapointe and S. Rich	Knoepp	0.2	\$425.00	\$85.00	
11/19/2015	Email C. Blackburn Re: weekly pay	Knoepp	0.2	\$425.00	\$85.00	
11/19/2015	Edit motion for extension of discovery period	Knoepp	0.1	\$425.00	\$42.50	
11/19/2015	Kiawah email document review	Knoepp	1	\$425.00	\$425.00	
11/20/2015	Work on damages related to housing charges	Knoepp	0.4	\$425.00	\$170.00	
11/20/2015	Document review- Kiawah emails	Knoepp	5	\$425.00	\$2,125.00	

Date	Description	Staff	Dur/Qty	Proposed Rate	Amount	Notes
11/23/2015	Document review- Kiawah email production	Knoepp	3.1	\$425.00	\$1,317.50	
11/24/2015	Phone call with M. Cherry re: weekly payroll, tip credit, and OI pay rates	Knoepp	0.5	\$425.00	\$212.50	
11/24/2015	Document review- Kiawah email production	Knoepp	3.4	\$425.00	\$1,445.00	
11/25/2015	Document review- Kiawah email production	Knoepp	1.2	\$425.00	\$510.00	
11/26/2015	Document review- Kiawah email production	Knoepp	1.5	\$425.00	\$637.50	
12/1/2015	Document review- Kiawah email production	Knoepp	1.8	\$425.00	\$765.00	
12/2/2015	Call with M. Cherry re: weekly payroll still needed	Knoepp	0.2	\$425.00	\$85.00	
12/4/2015	Document review- Kiawah email production	Knoepp	0.3	\$425.00	\$127.50	
12/7/2015	Document review re: Jackie Regan to assist team with depo prep	Knoepp	0.5	\$425.00	\$212.50	
12/7/2015	Document review of Beverly Wall documents to assist team with depo prep	Knoepp	1.7	\$425.00	\$722.50	
12/7/2015	Call with M. Cherry re: weekly payroll	Knoepp	0.2	\$425.00	\$85.00	
12/8/2015	Document review to assist with depositions of Wall, Simpson, Regan	Knoepp	1.2	\$425.00	\$510.00	
12/8/2015	Review payroll spreadsheet and docs and send email to defendant's counsel with deficiencies	Knoepp	0.3	\$425.00	\$127.50	
12/8/2015	Meeting with S. Rich and M. Lapointe re: depositions, missing docs, lack of expert disclosure from defendant	Knoepp	1.1	\$425.00	\$467.50	
12/9/2015	Document review to assist with depo prep of Wall, Simpson, Regan	Knoepp	2.9	\$425.00	\$1,232.50	
12/9/2015	Call with M. Cherry to discuss first workweek payroll information	Knoepp	0.3	\$425.00	\$127.50	
12/14/2015	Document review for Regan deposition	Knoepp	1.3	\$425.00	\$552.50	
12/15/2015	Review Karla Bujak emails	Knoepp	1.4	\$425.00	\$595.00	
12/15/2015	Review supplemental interrogatory answers	Knoepp	0.1	\$425.00	\$42.50	
12/15/2015	Email to opposing counsel re: missing files from Kiawah servers	Knoepp	0.1	\$425.00	\$42.50	
12/16/2015	Call with C. Blackburn and M. Cherry re: payroll production issues	Knoepp	0.9	\$425.00	\$382.50	
12/17/2015	Call with C. Blackburn and M. Cherry re: ongoing payroll production issues	Knoepp	0.7	\$425.00	\$297.50	
12/18/2015	Phone call with C. Blackburn and M. Cherry re: management reports; payroll records production; deposition scheduling.	Knoepp	0.5	\$425.00	\$212.50	
12/21/2015	Review Karla Bujak documents	Knoepp	1.4	\$425.00	\$595.00	
12/22/2015	Initial cursory review of new production	Knoepp	0.5	\$425.00	\$212.50	
12/22/2015	Discuss expert report with S. Rich and D. Werner	Knoepp	0.2	\$425.00	\$85.00	
12/22/2015	Review Karla Bujak documents	Knoepp	2.1	\$425.00	\$892.50	
12/22/2015	Review expert report	Knoepp	0.2	\$425.00	\$85.00	
12/23/2015	Review first workweeks spreadsheet prepared by defendant and compare to class list to error check completeness of damages	Knoepp	0.7	\$425.00	\$297.50	
12/23/2015	Review Elvis Moodle deposition to locate info re: pre-employment expenses	Knoepp	0.5	\$425.00	\$212.50	
12/23/2015	Review documents, CFR, and Federal Register to pin down pre-employment expenses	Knoepp	0.6	\$425.00	\$255.00	
12/23/2015	Cursory review of tip spreadsheet production	Knoepp	0.3	\$425.00	\$127.50	
12/23/2015	Team meeting with S. Rich and M. Lapointe to discuss expert report and discovery needed; discuss division of labor for upcoming depositions	Knoepp	0.4	\$425.00	\$170.00	
12/29/2015	Document review of Kiawah productions	Knoepp	1.6	\$425.00	\$680.00	
12/30/2015	Review mediation agreements	Knoepp	0.2	\$425.00	\$85.00	
12/31/2015	Call with C. Blackburn to discuss production of payroll, calculation of damages, mediation, supplementing discovery responses related to weekly meeting minutes	Knoepp	0.7	\$425.00	\$297.50	
1/7/2016	Review defendants' list of job categories and compare to payroll information; emails to C. Blackburn re: issues with same related to Cooks and Kitchen Helpers	Knoepp	0.3	\$425.00	\$127.50	
1/7/2016	Damages calculations for purposes of mediation/settlement conference	Knoepp	4.5	\$425.00	\$1,912.50	
1/7/2016	Review costs to date for purposes of mediation/settlement	Knoepp	0.2	\$425.00	\$85.00	
1/7/2016	Emails regarding wording on seeking more complete interrogatory response on tip credit issue	Knoepp	0.2	\$425.00	\$85.00	
1/7/2016	Review and edit mediation statement	Knoepp	0.8	\$425.00	\$340.00	
1/7/2016	Review M. Lapointe letter to C. Blackburn regarding discovery deficiencies	Knoepp	0.2	\$425.00	\$85.00	
1/8/2016	Review cases on attorney rates in D.S.C. for purposes of settlement/mediation	Knoepp	0.4	\$425.00	\$170.00	
1/8/2016	Deposition prep for Karla Bujak, including document review	Knoepp	1.5	\$425.00	\$637.50	
1/9/2016	Emails with M. Lapointe and S. Rich re: fees/costs to date	Knoepp	0.2	\$425.00	\$85.00	
1/9/2016	Email to and from C. Blackburn re: job titles	Knoepp	0.1	\$425.00	\$42.50	
1/9/2016	Deposition prep for Karla Bujak, including document review	Knoepp	0.5	\$425.00	\$212.50	
1/9/2016	Deposition and Mediation preparation	Knoepp	5.7	\$425.00	\$2,422.50	
1/10/2016	Travel time for deposition of K. Bujak and K. Tibbetts and mediation	Knoepp	5.5	\$425.00	\$2,337.50	
1/11/2016	Final prep work for K. Bujak deposition	Knoepp	1.5	\$425.00	\$637.50	
1/11/2016	Conduct deposition of Karla Bujak, including travel time to/from deposition	Knoepp	6.5	\$425.00	\$2,762.50	
1/12/2016	Dinner meeting with N. Bloodgood, S. Rich, M. Lapointe to discuss mediation and settlement strategy	Knoepp	1	\$425.00	\$425.00	
1/12/2016	Mediation preparation, including damages calculations	Knoepp	2.5	\$425.00	\$1,062.50	
1/12/2016	Legal research on tip credit	Knoepp	1.2	\$425.00	\$510.00	

Date	Description	Staff	Dur/Qty	Proposed Rate	Amount	Notes
1/13/2016	Travel time to mediation	Knoepp	0.4	\$425.00	\$170.00	
1/13/2016	Mediation	Knoepp	8.5	\$425.00	\$3,612.50	
1/13/2016	Travel time to return to Atlanta following depositions and mediation	Knoepp	5.5	\$425.00	\$2,337.50	
1/14/2016	Email to/from C. Blackburn re: discrepancy in first workweek calculations	Knoepp	0.1	\$425.00	\$42.50	
1/14/2016	Work on preparing counter-offer to defendant's mediation offer	Knoepp	0.6	\$425.00	\$255.00	
1/14/2016	Meeting with M. Lapointe and S. Rich to discuss response to settlement offer and preparation for Bozard deposition and FLECTS depositions	Knoepp	0.5	\$425.00	\$212.50	
1/14/2016	Review opt-out filings; adjust damages	Knoepp	0.4	\$425.00	\$170.00	
1/14/2016	Document review in preparation for Bozard deposition	Knoepp	0.4	\$425.00	\$170.00	
1/15/2016	Deposition prep work for Jennifer Bozard	Knoepp	0.8	\$425.00	\$340.00	
1/15/2016	Revise calculations and put together counter offer and email to Defendant	Knoepp	1.4	\$425.00	\$595.00	
1/16/2016	Review documents to assist M. Lapointe with J. Bozard deposition prep	Knoepp	1.9	\$425.00	\$807.50	
1/17/2016	Deposition prep for Jennifer Bozard; review and edit M. Lapointe outline and questions	Knoepp	2	\$425.00	\$850.00	
1/17/2016	Review documents to find first days of work documents for 2012 for Bozard deposition	Knoepp	1.2	\$425.00	\$510.00	
1/18/2016	Deposition prep for Jennifer Bozard	Knoepp	0.5	\$425.00	\$212.50	
1/20/2016	Review and re-work tip credit damages	Knoepp	0.4	\$425.00	\$170.00	
1/20/2016	Consult with M. Lapointe and S. Rich re: settlement and tip credit damages	Knoepp	0.3	\$425.00	\$127.50	
1/20/2016	Emails to and from N. Bloodgood re: tip credit and settlement	Knoepp	0.2	\$425.00	\$85.00	
1/20/2016	Legal Research on tip credit notification requirements	Knoepp	1.5	\$425.00	\$637.50	
1/21/2016	Phone call with C. Blackburn to discuss motion to amend complaint re: tip credit; settlement; motion deadlines	Knoepp	0.5	\$425.00	\$212.50	
1/22/2016	Review and revise 30(b)(6) topics and send to C. Blackburn	Knoepp	0.7	\$425.00	\$297.50	
1/22/2016	Phone call with C. Blackburn re: scheduling 30(b)(6), settlement possibilities	Knoepp	0.3	\$425.00	\$127.50	
1/22/2016	Email to C. Blackburn re tip credit, damages for violation. Review of cases.	Knoepp	0.3	\$425.00	\$127.50	
1/24/2016	Review class list and provide to C. Blackburn per her request	Knoepp	1.2	\$425.00	\$510.00	
1/24/2016	Review and edit memo in support of motion to amend	Knoepp	0.3	\$425.00	\$127.50	
1/25/2016	Phone call with N. Bloodgood re: call she received from mediator last Friday	Knoepp	0.3	\$425.00	\$127.50	
1/25/2016	Review Defendant's production of documents related to B. Perry Woodside; email to counsel re same	Knoepp	0.5	\$425.00	\$212.50	
1/25/2016	Final edits to motion to amend and memo; provide to S. Rich for filing	Knoepp	0.5	\$425.00	\$212.50	
1/25/2016	Review Defendant's document production to find recruitment ads, offer letters, and personnel manual to review for tip information	Knoepp	0.5	\$425.00	\$212.50	
1/25/2016	Finalize 30(b)(6) topics and send notice to opposing counsel	Knoepp	1.5	\$425.00	\$637.50	
1/25/2016	Prepare Second Amended Complaint	Knoepp	0.2	\$425.00	\$85.00	
1/26/2016	Discussion with S. Rich about P. Perry Woodside deposition and large exhibit re documents he reviewed to prepare report	Knoepp	0.2	\$425.00	\$85.00	
1/26/2016	Discuss FLECTS deposition with S. Rich; send documents re: class and job titles/visa categories	Knoepp	0.2	\$425.00	\$85.00	
1/26/2016	Review and process subpoena response from B. Perry Woodside	Knoepp	0.5	\$425.00	\$212.50	
1/26/2016	Review opt-out forms; revise damages and class list	Knoepp	1	\$425.00	\$425.00	
1/26/2016	Review and process Third Supplemental Production from Plaintiffs	Knoepp	0.4	\$425.00	\$170.00	
1/26/2016	Phone call with C. Blackburn re: 30(b)(6) deposition, possible request to extend dispositive and Daubert motion deadlines; settlement response	Knoepp	0.4	\$425.00	\$170.00	
1/27/2016	Review Desmond Ellis documents and place into deposition prep folder	Knoepp	0.7	\$425.00	\$297.50	
1/27/2016	Revise 30(b)(6) notice to include whose testimony would be designated with respect to which topics and send to C. Blackburn for review.	Knoepp	0.4	\$425.00	\$170.00	
1/27/2016	Meet with M. Lapointe and S. Rich to discuss 30(b)(6) deposition topics and identify who already testified regarding which topics and what additional info needed	Knoepp	0.5	\$425.00	\$212.50	
1/27/2016	Prep work for B. Perry Woodside deposition related to reasonable cost of housing; reviewing documents in Xera related to different costs to use during deposition	Knoepp	1.5	\$425.00	\$637.50	
1/27/2016	Phone call with C. Blackburn re 30(b)(6) deposition and extension of time	Knoepp	0.3	\$425.00	\$127.50	
1/28/2016	Pull additional housing information for Perry Woodside deposition	Knoepp	0.2	\$425.00	\$85.00	
1/28/2016	Reviewing documents to use during Roger Warren deposition	Knoepp	0.6	\$425.00	\$255.00	
1/28/2016	Document look-up to assist with FLECTS deposition on rush basis	Knoepp	0.4	\$425.00	\$170.00	
1/28/2016	Provide Defendant with B. Perry Woodside subpoena response documents	Knoepp	0.2	\$425.00	\$85.00	
1/28/2016	Review prior scheduling orders; prepare joint motion to modify scheduling order; email with C. Blackburn re same	Knoepp	0.5	\$425.00	\$212.50	
1/29/2016	Emails to and from M. Lapointe re: Desmond Ellis deposition questions	Knoepp	0.2	\$425.00	\$85.00	
1/29/2016	Respond to email from C. Blackburn re: scope of deposition of Roger Warren	Knoepp	0.2	\$425.00	\$85.00	
1/29/2016	Deposition prep for Roger Warren deposition	Knoepp	2.5	\$425.00	\$1,062.50	
1/30/2016	Email to team summarizing call with C. Blackburn and asking for thoughts on extension, Warren confidentiality	Knoepp	0.2	\$425.00	\$85.00	
1/30/2016	Phone call with C. Blackburn re 30(b)(6) deposition, extension of time, confidentiality of Roger Warren testimony	Knoepp	0.3	\$425.00	\$127.50	
1/31/2016	Finalize supplement to Plaintiffs' interrogatory responses with respect to damages; send email to opposing counsel re same	Knoepp	1.5	\$425.00	\$637.50	

Date	Description	Staff	Dur/Qty	Proposed Rate	Amount	Notes
1/31/2016	Deposition prep and document review for Roger Warren deposition	Knoepp	2.8	\$425.00	\$1,190.00	
1/31/2016	Travel time to Charleston for deposition of Woodside, Warren, 30(b)(6)	Knoepp	5.5	\$425.00	\$2,337.50	
2/1/2016	Finalize joint motion for extension of time	Knoepp	0.2	\$425.00	\$85.00	
2/1/2016	Prepare for Kiawah 30(b)(6) deposition	Knoepp	0.4	\$425.00	\$170.00	
2/1/2016	Deposition of Roger Warren	Knoepp	2.5	\$425.00	\$1,062.50	
2/1/2016	Travel time to deposition of B. Perry Woodside and Roger Warren	Knoepp	0.3	\$425.00	\$127.50	
2/2/2016	Return travel to Atlanta following depositions of B. Perry Woodside, R. Warren, and 30(b)(6) of Kiawah Island Inn Co.	Knoepp	4.5	\$425.00	\$1,912.50	
2/2/2016	Discussion with C. Blackburn after deposition re possible settlement	Knoepp	0.3	\$425.00	\$127.50	
2/2/2016	Conduct 30(b)(6) deposition of Kiawah Island Inn Company	Knoepp	2	\$425.00	\$850.00	
2/2/2016	Travel time to 30(b)(6) deposition of Kiawah	Knoepp	0.3	\$425.00	\$127.50	
2/3/2016	Emails among co-counsel re: local rule requiring the filing of a protective order on SA privilege	Knoepp	0.2	\$425.00	\$85.00	
2/3/2016	Review documents for filing 2A Complaint; email to M. Lapointe re: certificate of service	Knoepp	0.2	\$425.00	\$85.00	
2/3/2016	Emails to and from S. Rich re follow-up on FLECTS 30(b)(6) with respect to travel to consulate in 2014 and 2015	Knoepp	0.2	\$425.00	\$85.00	
2/3/2016	Respond to email from J. Hood re: motion to enlarge time to receive opt-out forms	Knoepp	0.1	\$425.00	\$42.50	
2/3/2016	Meeting with S. Rich, M. Lapointe, C. Martinez to review outline for summary judgment motion, discuss issues, and divide up tasks	Knoepp	1	\$425.00	\$425.00	
2/4/2016	Review of damages for purposes of providing supplement to Plaintiffs' interrogatory responses	Knoepp	0.8	\$425.00	\$340.00	
2/4/2016	Phone call with C. Blackburn re joint motion to extend deadline to file motion for protective order re Desmond Ellis deposition	Knoepp	0.3	\$425.00	\$127.50	
2/4/2016	Call with J. Leonard to consult about tip credit damages	Knoepp	0.3	\$425.00	\$127.50	
2/5/2016	Email to C. Blackburn re: Kiawah position with respect to FLECTS correction	Knoepp	0.1	\$425.00	\$42.50	
2/5/2016	Call with Y. Flick re: correction of deposition of FLECTS with respect to Consulate in 2014 and 2015	Knoepp	0.2	\$425.00	\$85.00	
2/8/2016	Gather evidence of what tip notification was provided to workers (from exhibits and testimony)	Knoepp	0.2	\$425.00	\$85.00	
2/8/2016	Brief deposition transcript review and coding for summary judgment motion	Knoepp	0.3	\$425.00	\$127.50	
2/8/2016	Legal research on tips and wages under the South Carolina Payment of Wages Act	Knoepp	0.5	\$425.00	\$212.50	
2/8/2016	Legal research on tip credit notification cases	Knoepp	1.5	\$425.00	\$637.50	
2/10/2016	Deposition review and coding for summary judgment facts and briefing	Knoepp	1.7	\$425.00	\$722.50	
2/11/2016	Re-work damages figures for C. Blackburn into readable chart and send email: re-do attorneys' fees calculations to update.	Knoepp	0.8	\$425.00	\$340.00	
2/11/2016	Discussion with M. Lapointe and S. Rich re: call with Cherie and our settlement position	Knoepp	0.2	\$425.00	\$85.00	
2/11/2016	Follow-up call with C. Blackburn re possible settlement; request to provide numbers in easy to understand table	Knoepp	0.4	\$425.00	\$170.00	
2/11/2016	Call with C. Blackburn re filing something related to trial date, summary judgment, settlement	Knoepp	0.2	\$425.00	\$85.00	
2/15/2016	Response to C. Blackburn email regarding liquidated damages and SCPWA treble damages	Knoepp	0.1	\$425.00	\$42.50	
2/17/2016	Legal research on 30(b)(6) deponents and hearsay/lack of personal knowledge (for purposes of tip credit notice summary judgment)	Knoepp	1.5	\$425.00	\$637.50	
2/20/2016	Email to co-counsel re: call with C. Blackburn re: second round of mediation	Knoepp	0.1	\$425.00	\$42.50	
2/20/2016	Call with C. Blackburn re: second round of mediation	Knoepp	0.2	\$425.00	\$85.00	
2/23/2016	Discussions with M. Lapointe and S. Rich re round 2 of mediation	Knoepp	0.2	\$425.00	\$85.00	
2/23/2016	Phone calls with C. Blackburn re second round of mediation and extending deadlines for motions	Knoepp	0.3	\$425.00	\$127.50	
2/24/2016	Document review to ensure completeness of documents produced at recent depositions	Knoepp	0.3	\$425.00	\$127.50	
2/24/2016	Review confidential designations for B. Perry Woodside III deposition; email to S. Rich re same	Knoepp	0.2	\$425.00	\$85.00	
2/24/2016	Prepare joint motion for extension of time and proposed order; email to C. Blackburn for review	Knoepp	0.4	\$425.00	\$170.00	
2/26/2016	Emails to and from C. Blackburn and M. Flatt re settlement discussions	Knoepp	0.2	\$425.00	\$85.00	
2/27/2016	Deposition review and coding (Kiawah 30(b)(6), Roger Warren, Karla Bujak - partial)	Knoepp	1.5	\$425.00	\$637.50	
2/29/2016	Phone call with C. Blackburn re: summary judgment deadline, settlement	Knoepp	0.2	\$425.00	\$85.00	
2/29/2016	Call with M. Flatt to discuss settlement and mediation	Knoepp	0.7	\$425.00	\$297.50	
2/29/2016	Review damages calculations in preparation for call with M. Flatt re settlement	Knoepp	0.3	\$425.00	\$127.50	
3/1/2016	Preliminary work on statement of undisputed facts	Knoepp	1.5	\$425.00	\$637.50	
3/4/2016	Work on damages calculations in preparation for second mediation session	Knoepp	0.8	\$425.00	\$340.00	
3/4/2016	Meeting with D. Werner, S. Rich, and M. Lapointe to review damages calculations and prepare for mediation	Knoepp	0.7	\$425.00	\$297.50	
3/9/2016	Discussion with S. Rich re: Defendant's position on relation back of complaint and SOL	Knoepp	0.2	\$425.00	\$85.00	
3/9/2016	Phone calls with T. Wills re settlement offer and mediation on Friday	Knoepp	0.3	\$425.00	\$127.50	
3/9/2016	Phone call with C. Blackburn and R. Glasgow re: damages calculations	Knoepp	0.5	\$425.00	\$212.50	
3/9/2016	Phone call with N. Bloodgood re: settlement offer from Defendant	Knoepp	0.2	\$425.00	\$85.00	
3/9/2016	Phone call with M. Flatt and J. Jones re settlement	Knoepp	0.2	\$425.00	\$85.00	
3/10/2016	Discussion with S. Rich, D. Werner, C. Martinez re: settlement offer from Defendant; communications with clients re same	Knoepp	0.3	\$425.00	\$127.50	
3/10/2016	Review and edit confidential mediation statement for second round of mediation	Knoepp	0.4	\$425.00	\$170.00	
3/10/2016	Review of damages calculations and scenarios in advance of making counter offer	Knoepp	0.3	\$425.00	\$127.50	
3/10/2016	Phone call to M. Flatt re: Plaintiffs' counter offer to settlement offer	Knoepp	0.2	\$425.00	\$85.00	
3/10/2016	Travel time to Charleston for second mediation	Knoepp	5	\$425.00	\$2,125.00	
3/11/2016	Travel time from Charleston to Atlanta following mediation	Knoepp	5.5	\$425.00	\$2,337.50	

Date	Description	Staff	Dur/Qty	Proposed Rate	Amount	Notes
3/11/2016	Mediation	Knoepp	8	\$425.00	\$3,400.00	
3/11/2016	Travel time from hotel to mediation location	Knoepp	0.3	\$425.00	\$127.50	
3/14/2016	Work on damage allocations	Knoepp	1	\$425.00	\$425.00	
3/14/2016	Email to opposing counsel re: phone call with Court and preparing joint motion to stay deadlines	Knoepp	0.1	\$425.00	\$42.50	
3/14/2016	Phone call with Court to advise that matter has been settled.	Knoepp	0.1	\$425.00	\$42.50	
3/14/2016	Emails to and from Ryan Glasgow re class member damages calculations and service fees	Knoepp	0.3	\$425.00	\$127.50	
3/17/2016	Prepare joint motion to stay deadlines	Knoepp	0.2	\$425.00	\$85.00	
3/25/2016	Work on damages allocations for FLA and R23 class	Knoepp	2	\$425.00	\$850.00	
3/30/2016	Work on draft of settlement agreement	Knoepp	1.5	\$425.00	\$637.50	
3/31/2016	revisions to settlement agreement draft based on feedback from S. Rich; email to opposing counsel with draft agreement	Knoepp	0.4	\$425.00	\$170.00	
3/31/2016	Finish draft of settlement agreement	Knoepp	2.3	\$425.00	\$977.50	
4/11/2016	Review proposal from Settlement Services re class administration	Knoepp	0.3	\$425.00	\$127.50	
4/11/2016	Email to opposing counsel checking on status of draft agreement and informing them about response from administrator re tax payments	Knoepp	0.2	\$425.00	\$85.00	
4/14/2016	Work on motion and memorandum in support of joint motion for preliminary approval	Knoepp	2.5	\$425.00	\$1,062.50	
4/14/2016	Review edits provided by defendant to draft agreement. Email to opposing counsel with initial thoughts.	Knoepp	0.6	\$425.00	\$255.00	
4/18/2016	Draft joint status report	Knoepp	0.2	\$425.00	\$85.00	
4/19/2016	Prepare edits to Settlement Agreement; send to opposing counsel	Knoepp	0.6	\$425.00	\$255.00	
4/21/2016	Review revisions from Defendant to motion, memo, and proposed order	Knoepp	0.4	\$425.00	\$170.00	
4/21/2016	Prepare class action notice; send to opposing counsel for review	Knoepp	1.2	\$425.00	\$510.00	
4/22/2016	Prepare Claim Form; send to opposing counsel for review	Knoepp	0.5	\$425.00	\$212.50	
4/25/2016	work with A. Sudler on issues with respect to sorting Exhibit C (damages figures by individual)	Knoepp	0.3	\$425.00	\$127.50	
4/27/2016	Finalize joint motion, memo, and proposed order and send to opposing counsel for review	Knoepp	0.5	\$425.00	\$212.50	
4/27/2016	Finalize Settlement Agreement and Exhibits	Knoepp	0.4	\$425.00	\$170.00	
5/11/2016	Finalize and prepare for filing all paperwork for preliminary approval; send to co-counsel	Knoepp	0.3	\$425.00	\$127.50	
6/14/2016	Hearing on preliminary approval of settlement and motion to partially seal	Knoepp	0.3	\$425.00	\$127.50	
6/14/2016	Travel time to and from Charleston for hearing on preliminary approval of settlement and motion to partially seal	Knoepp	4	\$425.00	\$1,700.00	
11/28/2016	Preliminary work on attorneys' fees motion	Knoepp	0.3	\$425.00	\$127.50	
11/29/2016	Prepare memorandum in support of final approval of settlement	Knoepp	2.8	\$425.00	\$1,190.00	
11/30/2016	Edits to memorandum in support of final approval	Knoepp	0.2	\$425.00	\$85.00	

Date	Description	Staff	Dur/Qty	Proposed Rate	Amount	Notes
4/8/2015	Gathered and organized clients' retainers and other pertinent documents to file in cabinet	Martinez	1	\$0.00	\$0.00	Eliminated in the exercise of billing judgment
11/1/2015	Meet with two class members from the Philippines to discuss FLSA collective action.	Martinez	0.2	\$0.00	\$0.00	Eliminated in the exercise of billing judgment
11/1/2015	Meeting and deposition preparation with four clients.	Martinez	2	\$0.00	\$0.00	Eliminated in the exercise of billing judgment
11/1/2015	Travel to/from meeting with clients at the Ashley apts for deposition prep.	Martinez	0.2	\$0.00	\$0.00	Eliminated in the exercise of billing judgment
11/2/2015	Travel from Charleston to Atlanta	Martinez	5.5	\$0.00	\$0.00	Eliminated in the exercise of billing judgment
11/2/2015	Travel to/from Ashley apartments to Nexsen Pruet law offices for depositions.	Martinez	0.5	\$0.00	\$0.00	Eliminated in the exercise of billing judgment
11/2/2015	Depositions of four clients.	Martinez	5.5	\$0.00	\$0.00	Eliminated in the exercise of billing judgment
11/3/2015	Travel from Atlanta to Charleston for depositions of named ptf Elvis and 3 opt-in plfs.	Martinez	5.5	\$0.00	\$0.00	Eliminated in the exercise of billing judgment
3/1/2015	Call to Keisha Ennis to clarify recruitment details for complaint	Martinez	0.67	\$100.00	\$67.00	
3/1/2015	Call to Desmond Ellis to obtain more recruitment details for complaint	Martinez	0.33	\$100.00	\$33.00	
3/1/2015	Reviewed complaint draft and noted information we needed to obtain from clients, reviewed clients notes	Martinez	0.67	\$100.00	\$67.00	
3/2/2015	Typed up notes from conversation with clients Keisha and Desmond, inputted Keisha's docs and notes into TM and billing	Martinez	1.5	\$100.00	\$150.00	
3/4/2015	Called clients to obtain visa and housing information for complaint	Martinez	0.75	\$100.00	\$75.00	
3/4/2015	Reviewed clients' phone records and corresponded with ML regarding follow up questions to clarify facts for complaint	Martinez	1	\$100.00	\$100.00	
3/5/2015	Organizing and creating Exhibits C-E for filing	Martinez	1	\$100.00	\$100.00	
3/6/2015	Reviewed exhibits to ensure they were in order, nothing missing	Martinez	0.5	\$100.00	\$50.00	
3/10/2015	Drafted Keisha's declaration	Martinez	1.5	\$100.00	\$150.00	
3/10/2015	Call to client Keisha Collins-Ennis to confirm recruitment facts for declaration	Martinez	1	\$100.00	\$100.00	
3/10/2015	Reviewed client notes & prepped for calls to confirm recruitment facts	Martinez	0.5	\$100.00	\$50.00	
3/12/2015	Revising declarations for clients Keisha Collins-Ennis and Desmond Ellis	Martinez	2	\$100.00	\$200.00	
3/13/2015	Phone conversation with Keisha to clarify details for declaration	Martinez	1	\$100.00	\$100.00	
3/13/2015	Revising Keisha and Desmond's declaration	Martinez	0.5	\$100.00	\$50.00	
3/27/2015	Conference call with ML, CM and SRICH regarding service of lawsuit and media	Martinez	0.3	\$100.00	\$30.00	
3/27/2015	Conference call with ML, CM and SRICH with Desmond Ellis to discuss next steps in lawsuit	Martinez	0.1	\$100.00	\$10.00	
3/27/2015	Conference call with ML and SRICH with client Rayon Fisher to discuss service of lawsuit	Martinez	0.3	\$100.00	\$30.00	
4/28/2015	Outreach with EAM in Charleston, South Carolina to speak to current Kiawah clients and potential clients.	Martinez	3.25	\$100.00	\$325.00	
4/28/2015	Outreach with EAM in Charleston, South Carolina to speak to current Kiawah clients and potential clients.	Martinez	5	\$100.00	\$500.00	
4/29/2015	Outreach with EAM in Charleston, South Carolina to speak to current Kiawah clients and potential clients.	Martinez	5	\$100.00	\$500.00	
4/29/2015	Outreach with EAM in Charleston, South Carolina to speak to current Kiawah clients and potential clients.	Martinez	2	\$100.00	\$200.00	
4/29/2015	Began drafting outreach memo summarizing points and issues we discussed with potential clients.	Martinez	1.08	\$100.00	\$108.00	
4/29/2015	Outreach with EAM in Charleston, South Carolina to speak to current Kiawah clients and potential clients.	Martinez	2.25	\$100.00	\$225.00	
4/29/2015	Outreach with EAM in Charleston, South Carolina to speak to current Kiawah clients and potential clients.	Martinez	2.5	\$100.00	\$250.00	
5/19/2015	Spoke with opt-in client, Donovan, briefly to give updates on Kiawah matter.	Martinez	0.08	\$100.00	\$8.00	
6/29/2015	Called opt-in plaintiffs to discuss possible pay issues, confirm contact information, give matter update.	Martinez	1.75	\$100.00	\$175.00	
7/14/2015	Saved and filed new opt-in client Jacqueline Tibby's documents. Prepared Notice of Filing FLSA Consent.	Martinez	0.67	\$100.00	\$67.00	
8/10/2015	Meeting with Michelle Lapointe, Sarah Rich, and Becky Cassler regarding responses to interrogatories and RFPs	Martinez	0.5	\$100.00	\$50.00	
8/11/2015	Reviewed TM and Escanif for missing plaintiffs documents. Started loading missing documents.	Martinez	0.5	\$100.00	\$50.00	
8/12/2015	Reviewed and OCR scanned plaintiffs documents in EScanit	Martinez	1.5	\$100.00	\$150.00	
8/12/2015	Reviewed ptf Rayon Fisher's documents. Called him and explained and discussed def interrogatories.	Martinez	1.75	\$100.00	\$175.00	
8/13/2015	Worked on developing a sheet of Kiawah workers' full American addresses to send FLSA notice.	Martinez	0.13	\$100.00	\$13.00	
8/13/2015	Merged email addresses in preparation for mass email of FLSA notice.	Martinez	0.5	\$100.00	\$50.00	
8/13/2015	Added email addresses to Kiawah class spreadsheet to send FLSA notice.	Martinez	1.47	\$100.00	\$147.00	
8/13/2015	Worked on developing a sheet of Kiawah workers' full American addresses to send FLSA notice.	Martinez	1.7	\$100.00	\$170.00	
8/21/2015	Reviewed and edited the damages portion of Rayon's responses to interrogatories.	Martinez	0.67	\$100.00	\$67.00	
8/21/2015	Corresponded with potential opt-ins regarding the FLSA notice of right to opt-in.	Martinez	0.13	\$100.00	\$13.00	
8/21/2015	Reviewed and edited Desmond's response to interrogatories.	Martinez	0.5	\$100.00	\$50.00	
8/23/2015	Edited and proofread Rayon and Desmond's interrogatory response drafts.	Martinez	1.5	\$100.00	\$150.00	
8/24/2015	Edited Desmond's responses and reviewed the response for clarity.	Martinez	0.83	\$100.00	\$83.00	
8/24/2015	Clarified some details in interrogatory response with Desmond.	Martinez	0.42	\$100.00	\$42.00	
8/24/2015	Reviewed Desmond's responses in preparation for reviewing it with Desmond over the phone.	Martinez	0.25	\$100.00	\$25.00	
8/24/2015	Edited Rayon's responses after additional clarifications on recruitment details.	Martinez	0.38	\$100.00	\$38.00	
8/24/2015	Reviewed Rayon's interrogatory responses, made minor edits, and reviewed with Rayon.	Martinez	0.55	\$100.00	\$55.00	
8/25/2015	Email correspondence with Michelle and Sarah regarding Desmond's responsive documents.	Martinez	0.17	\$100.00	\$17.00	

PLAINTIFF'S
EXHIBIT
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Date	Description	Staff	Dur/Qty	Proposed Rate	Amount	Notes
8/25/2015	Reviewed and edited Rayon and Desmond's interrogatory responses.	Martinez	0.78	\$100.00	\$78.00	
8/25/2015	Reviewed Michelle's edits on Rayon and Desmond's interrogatory responses and highlighted final areas that need clarification.	Martinez	1.42	\$100.00	\$142.00	
8/26/2015	Reviewed Desmond's documents.	Martinez	0.03	\$100.00	\$3.00	
8/26/2015	Call to Keisha to confirm one last recruitment detail for her response to interrogatories.					
8/26/2015	Saved new opt-in clients' contact information. Updated opt-in client contact sheet. Created labels and filed opt-ins #31-37 consent forms.	Martinez	1.03	\$100.00	\$103.00	
8/26/2015	Scanned new opt-ins 36 and 37 paperwork. Drafted seventeenth notice to file FLSA consents.	Martinez	0.2	\$100.00	\$20.00	
8/26/2015	Reviewed edits to Desmond's response to interrogatories draft.	Martinez	0.25	\$100.00	\$25.00	
8/27/2015	Team meeting with ML, JK, SRICH and EAM to talk about XERA coding of Kiawah-related documents.	Martinez	1	\$100.00	\$100.00	
9/10/2015	Researching and reserving hotel for 9/16-9/17 outreach.	Martinez	0.42	\$100.00	\$42.00	
9/11/2015	Sent notice and FLSA consent forms for 47 & 47 to Amanda (paralegal for co counsel).	Martinez	0.08	\$100.00	\$8.00	
9/11/2015	Updated opt-in client information spreadsheet with new opt-ins and filed consent forms in the filing cabinet.	Martinez	0.33	\$100.00	\$33.00	
9/11/2015	Edited FLSA notice for new opt-ins (46 & 47). Sent draft notice with consent forms to SRICH, JK, and ML. Made new contact matters and saved to TM.					
9/11/2015	Chat with ML about Desmond's notes and whether they are responsive.	Martinez	0.72	\$100.00	\$72.00	
9/11/2015	Called Desmond to discuss notes on his documents. Sent notes from this conversation to SRICH.	Martinez	0.03	\$100.00	\$3.00	
9/11/2015	Scanned opt-in forms (46 & 47) received in mail today (9/11). Began drafting notice of filing fisa consent forms.	Martinez	0.2	\$100.00	\$20.00	
9/11/2015	Drafted an agenda for meetings with clients during Charleston outreach next week. Developed a list of items to bring and questions to bring up to our clients. Sent ideas to SRICH.	Martinez	0.17	\$100.00	\$17.00	
9/11/2015	Chatted with SRICH, reviewed questions I needed to ask Desmond regarding notes on earlier documents he sent us.					
9/11/2015	Finished check request for NC process server re: Brantley apt's owner subpoena.	Martinez	0.08	\$100.00	\$8.00	
9/11/2015	Left voicemail for Mark from St Andrews park to reserve facility. Finished facility registration form. Scanned and prepared email to send to Mark.	Martinez	0.25	\$100.00	\$25.00	
9/15/2015	Updated opt-in clients' information on spreadsheet with Ashley apartment numbers.	Martinez	0.42	\$100.00	\$42.00	
9/15/2015	Sent outreach info to some opt-in clients to spread the word. Answered a couple of questions.	Martinez	0.33	\$100.00	\$33.00	
9/16/2015	Met with potential and current clients at the Ashley apartments. Went over the claims of the lawsuit, collective and class actions, as well as latest updates.	Martinez	3.25	\$100.00	\$325.00	
9/16/2015	Travelled to Charleston with SRICH to meet with current and potential clients.	Martinez	5.5	\$100.00	\$550.00	
9/16/2015	Updated opt-in clients' job titles and years worked on spreadsheet.	Martinez	1.17	\$100.00	\$117.00	
9/16/2015	Responded to Michelle Lapointe's email regarding apartment subpoena. Skimmed through subpoena response.	Martinez	0.13	\$100.00	\$13.00	
9/16/2015	Uploaded NHE, Inc subpoena into e-scan it. Began OCR	Martinez	2.08	\$100.00	\$208.00	
9/17/2015	Met with a couple of current and potential opt-in clients. Uploaded new opt-ins forms and drafted notice.	Martinez	3	\$100.00	\$300.00	
9/21/2015	Chat with lead plaintiff Desmond Ellis regarding updates in the lawsuit.	Martinez	0.08	\$100.00	\$8.00	
9/21/2015	Updated new opt-in clients' information on spreadsheet. Updated job positions in years 2012-2015 and Ashley apartment number. Sent to SRICH for review.					
9/21/2015	Updated date on notice to file for opt-in #57. Emailed draft and FLSA consent to Amanda Kramer and Nancy Bloodgood.	Martinez	1.67	\$100.00	\$167.00	
9/21/2015	Scanned new opt-in FLSA paperwork for #57. Drafted notice to file. Sent to team (JK, SRICH, ML) for edits.	Martinez	0.17	\$100.00	\$17.00	
9/22/2015	Saved and prepared new opt in form (#58). Drafted notice to file.	Martinez	0.5	\$100.00	\$50.00	
9/24/2015	Double-checked class list for accuracy (i.e. years worked). Emailed SRICH.	Martinez	0.1	\$100.00	\$10.00	
9/24/2015	Finished saving new opt-in plaintiffs documents to TM	Martinez	0.25	\$100.00	\$25.00	
9/25/2015	Saved new contacts from outreach into TM.	Martinez	0.75	\$100.00	\$75.00	
9/28/2015	Numbering defendant's additional production of employee files for upload into Escanit.	Martinez	1.33	\$100.00	\$133.00	
9/28/2015	Numbering defendant's additional production of employee files for upload into Escanit.	Martinez	1.25	\$100.00	\$125.00	
9/29/2015	Numbering defendant's additional production of employee files for upload into Escanit.	Martinez	0.5	\$100.00	\$50.00	
10/1/2015	Saved forms to TM. Updated opt-in clients spreadsheet. Spoke to opt-in client Donovan Robertson to confirm receipt of documents.	Martinez	0.42	\$100.00	\$42.00	
10/1/2015	Scanned new opt in forms and drafted notice (#60).	Martinez	0.25	\$100.00	\$25.00	
10/1/2015	Spoke to Elvis Moodie to confirm we requested all paystubs and to confirm we would return them to him asap.	Martinez	0.08	\$100.00	\$8.00	
10/1/2015	Filtering class list for class members that may be in Jamaica. Conducted some limited research on areas outreach would target.					
10/1/2015	Emailed SRICH, JK, and ML about findings and thoughts.	Martinez	0.5	\$100.00	\$50.00	
10/1/2015	Confirmed with Elvis that we sent him a self addressed stamped envelope to send us his paystubs.	Martinez	0.08	\$100.00	\$8.00	
10/7/2015	Reviewed and scanned plaintiff Elvis Moodie's paystubs for additional plaintiff production.	Martinez	0.25	\$100.00	\$25.00	
10/7/2015	Reviewed additional def production of class member files. OCR Scanned files.	Martinez	2.5	\$100.00	\$250.00	

Date	Description	Staff	Dur/Qty	Proposed Rate	Amount	Notes
10/7/2015	Reviewed additional def production of class member files. Rotated and separated files, as needed for deductions form.	Martinez	1	\$100.00	\$100.00	
10/7/2015	Reviewed additional def production of class member files. Rotated and separated files, as needed for deductions form.	Martinez	1	\$100.00	\$100.00	
10/7/2015	Reviewed additional def production of class member files. Rotated and separated files, as needed for deductions form.	Martinez	0.58	\$100.00	\$58.00	
10/8/2015	Rotated and split documents in latest additional def production in EScanlt	Martinez	1.33	\$100.00	\$133.00	
10/9/2015	Drafted letter to process server to serve SCANA subpoena.	Martinez	0.12	\$100.00	\$12.00	
10/9/2015	Rotated and split documents in latest additional def production of class member documents in EScanlt.	Martinez	1.33	\$100.00	\$133.00	
10/9/2015	Splitting and rotating documents in additional def production in EScanlt.	Martinez	0.5	\$100.00	\$50.00	
10/9/2015	Finish preparing SCANA subpoena documents (sign cover letter and scan, prepare fedex label).	Martinez	0.17	\$100.00	\$17.00	
10/9/2015	Scanned new opt-in forms, drafted notice to file, circulated to SRICH, JK, ML.	Martinez	0.42	\$100.00	\$42.00	
10/9/2015	Rotating and splitting documents from latest additional def production (class member documents) in EScanlt	Martinez	0.67	\$100.00	\$67.00	
10/19/2015	Met and spoke with several opt-in and potential opt-in clients at the Gardens at Ashley River apartments. Reviewed the claims of lawsuit and answered questions.	Martinez	3.25	\$100.00	\$325.00	
10/19/2015	Travel with Michelle L. to Charleston to meet with opt-in clients and potential opt-in clients.	Martinez	5.33	\$100.00	\$533.00	
10/20/2015	Drove back towards Atlanta from Charleston.	Martinez	3	\$100.00	\$300.00	
10/20/2015	Drove back towards Atlanta from Charleston.	Martinez	1.83	\$100.00	\$183.00	
10/22/2015	Scanned and saved new opt-in flsa consent form (#77). Prepared draft notice. Sent to team.	Martinez	0.25	\$100.00	\$25.00	
10/22/2015	Call to Keisha to go over updates in the case and go over interrog #5 and #8.	Martinez	0.25	\$100.00	\$25.00	
10/23/2015	Saved notice to file for #77 and sent to co-counsel	Martinez	0.17	\$100.00	\$17.00	
10/23/2015	Took Desmond's call. Went over rogs #5 and #8 with him.	Martinez	0.25	\$100.00	\$25.00	
10/26/2015	Saved opt-in #79's forms and information into TM. Drafted notice to file and circulated to SRICH, JK, and ML for review.	Martinez	0.5	\$100.00	\$50.00	
10/26/2015	Double checked opt-in Lynval Watson's filing status. Drafted and sent email to Gloria about OCFC notice.	Martinez	0.25	\$100.00	\$25.00	
10/26/2015	Worked on first workweek damages calculations for opt-in plaintiffs.	Martinez	1.25	\$100.00	\$125.00	
10/26/2015	Worked on first workweek damages calculations for opt-in plaintiffs.	Martinez	1.08	\$100.00	\$108.00	
10/27/2015	Email corp re: Lynval Watson's opt-in filing date with SRICH, JK, ML.	Martinez	0.33	\$100.00	\$33.00	
10/27/2015	Scanned and saved FLA consent form for opt-in #80. Prepared draft notice to file and sent to JK, ML, SRICH. Sent to Amanda Kramer (local counsel) for filing.	Martinez	0.5	\$100.00	\$50.00	
10/27/2015	Worked on first work weeks damages calculations for opt-ins.	Martinez	0.17	\$100.00	\$17.00	
10/27/2015	Worked on first work weeks damages calculations for opt-ins.	Martinez	1.83	\$100.00	\$183.00	
10/27/2015	Saved Rayon's scanned pictures into PDFs and combined. Circulated to JK, SRICH, and ML to review.	Martinez	0.33	\$100.00	\$33.00	
10/27/2015	Saved Rayon's scanned tax returns into PDFs, combined into one PDF. Saved to TM and sent to SRICH, ML, JK.	Martinez	0.5	\$100.00	\$50.00	
10/29/2015	Worked on calculating first workweek damages for FLA opt-in plaintiffs	Martinez	2.17	\$100.00	\$217.00	
10/29/2015	Worked on calculating first workweek damages for FLA opt-in plaintiffs	Martinez	0.42	\$100.00	\$42.00	
10/29/2015	Met with SRICH and JK to discuss deposition prep.	Martinez	0.33	\$100.00	\$33.00	
10/30/2015	Worked on calculating first workweek damages for FLA opt-in plaintiffs.	Martinez	3.08	\$100.00	\$308.00	
10/30/2015	Worked on calculating first workweek damages for FLA opt-in plaintiffs.	Martinez	1.25	\$100.00	\$125.00	
10/30/2015	Drafted and sent emails with final drafts of modified interrogatory responses to named plaintiffs	Martinez	0.42	\$100.00	\$42.00	
10/30/2015	Worked on first workweek damages for FLA opt-in plaintiffs.	Martinez	0.33	\$100.00	\$33.00	
11/3/2015	Drafted email with updated 40th notice and circulated to JK, ML, SRICH.	Martinez	0.1	\$100.00	\$10.00	
11/3/2015	Drafted and sent email to Amanda Kramer, paralegal for local counsel.	Martinez	0.1	\$100.00	\$10.00	
11/3/2015	Finished editing the 40th notice to file FLA consent forms.	Martinez	0.42	\$100.00	\$42.00	
11/4/2015	Created list of missing payroll records of opt-in plaintiffs.	Martinez	0.78	\$100.00	\$78.00	
11/5/2015	Circulated list of missing payroll information for opt-in plaintiffs to JK, SRICH, ML.	Martinez	0.25	\$100.00	\$25.00	
11/7/2015	Edited list of missing payroll records of opt-in plaintiffs.	Martinez	0.75	\$100.00	\$75.00	
11/7/2015	Meeting with JK, SRICH, ML to discuss FLECTS and remaining plf depositions.	Martinez	1	\$100.00	\$100.00	
11/18/2015	Reviewed SRICH email re deposition plan and called Rayon Fisher to confirm his availability.	Martinez	0.2	\$100.00	\$20.00	
11/18/2015	Spoke to SRICH about deposition plan for remaining plfs. Reviewed email.	Martinez	0.1	\$100.00	\$10.00	
11/19/2015	Finished adding FLA opt-in dates to class sheet for opt-in plaintiffs.	Martinez	0.5	\$100.00	\$50.00	
11/19/2015	Began adding FLA opt-in dates to class sheet for opt-in plaintiffs.	Martinez	0.75	\$100.00	\$75.00	
11/23/2015	Phone conversation with Kiawah discussing modified interrogatories responses signature and upcoming deposition.	Martinez	0.2	\$100.00	\$20.00	
11/30/2015	Opened and scanned returned mail from Jamaica (all FLA collective action notices).	Martinez	0.7	\$100.00	\$70.00	
12/1/2015	Saved PDFs of yesterday's returned mail from Jamaica into TM.	Martinez	0.42	\$100.00	\$42.00	
12/3/2015	First workweek damages calculations for non opt-in plaintiffs.	Martinez	1.6	\$100.00	\$160.00	
12/4/2015	Calculating first workweek FLA damages for the rest of the class members with payroll information produced by plaintiffs.	Martinez	3.27	\$100.00	\$327.00	

Date	Description	Staff	Dur/Qty	Proposed Rate	Amount	Notes
12/7/2015	Called court reporter agency to hire reporter for defendant depositions.	Martinez	0.1	\$100.00	\$10.00	
12/7/2015	Calculating first workweek FLSA damages for the rest of the class members with payroll information produced by plaintiffs.	Martinez	1.5	\$100.00	\$150.00	
12/8/2015	Calculating first workweek FLSA damages for the rest of class members using payroll data provided by defendant.	Martinez	2.5	\$100.00	\$250.00	
12/8/2015	Calculating first workweek FLSA damages for the rest of class members using payroll data provided by defendant.	Martinez	2	\$100.00	\$200.00	
12/9/2015	Read and responded to Sarah Rich's email re: scheduling Desmond Ellis' deposition in Miami.	Martinez	0.1	\$100.00	\$10.00	
12/9/2015	Printed cover letter and scanned all subpoena documents. Prepared FedEx shipment to Clay Stacy for document subpoena to B. Perry Woodside.	Martinez	0.2	\$100.00	\$20.00	
12/29/2015	Email correspondence with Michelle L. re edits to cover letter to Clay Stacy, process server in Charleston for B. Perry Woodside document subpoena.	Martinez	0.1	\$100.00	\$10.00	
12/29/2015	Drafted cover letter to Clay Stacy with instructions on document subpoena to B. Perry Woodside, III	Martinez	0.1	\$100.00	\$10.00	
12/29/2015	Email correspondence to Clay Stacy, process server in Charleston, to arrange to process document subpoena to B. Perry Woodside, III	Martinez	0.1	\$100.00	\$10.00	
12/29/2015	Opened, de-stapled, and scanned returned FLSA collective action notice mailings.	Martinez	0.8	\$100.00	\$80.00	
12/30/2015	Saved PDFs of returned FLSA collective action notice mailings to TM.	Martinez	0.5	\$100.00	\$50.00	
1/5/2016	Call with AWR re: scheduling court reporter for Kiawah depositions of Bujak and Tibbetts	Martinez	0.1	\$100.00	\$10.00	
1/5/2016	Email correspondence with AWR re: scheduling court reporter for Kiawah depositions of Bujak and Tibbetts	Martinez	0.1	\$100.00	\$10.00	
1/5/2016	Called Rayon F. to discuss case updates and availability for a call during settlement conference on Jan 13, 2016	Martinez	0.2	\$100.00	\$20.00	
1/5/2016	Called Elvis M. to discuss case updates and availability for a call during settlement conference on Jan 13, 2016	Martinez	0.2	\$100.00	\$20.00	
1/6/2016	Correspondence with process server re: status of document subpoena for B. Perry Woodside	Martinez	0.1	\$100.00	\$10.00	
1/6/2016	Called Desmond E. to discuss case updates and availability for a call during settlement conference Jan 13, 2016	Martinez	0.2	\$100.00	\$20.00	
1/7/2016	Email correspondence with Sarah R. re: scheduling court reporter for Miami depositions of Perry Wells & FLECTS.	Martinez	0.1	\$100.00	\$10.00	
1/7/2016	Call with Keisha C. with case updates, including asking for availability on Jan 13, 2016 for settlement conference.	Martinez	0.2	\$100.00	\$20.00	
1/8/2016	Follow up email correspondence with court reporter Sabrina Beauvais for Miami depositions of Perry Wells and FLECTS.	Martinez	0.1	\$100.00	\$10.00	
1/8/2016	Receiving and forwarding AWR court reporter confirmation for deposition of Bujak 01/11/16.	Martinez	0.1	\$100.00	\$10.00	
1/8/2016	Calls to court reporting firms to ask for rates for deposition of Perry Wells and FLECTS in Miami on Jan 28, 2016	Martinez	0.2	\$100.00	\$20.00	
1/8/2016	Opened and scanned returned mail containing FLSA notices.	Martinez	0.4	\$100.00	\$40.00	
1/26/2016	Downloaded documents for "Big Exhibit" for expert deposition of B Perry Woodside into legal server in preparation for printing.	Martinez	1.2	\$100.00	\$120.00	
1/26/2016	Email correspondence with JK and SRICH about preparing "big exhibit" for expert deposition of B. Perry Woodside	Martinez	0.2	\$100.00	\$20.00	
1/26/2016	Phone call and follow up email with AWR court reporting agency to reserve Roxanne Easterwood for Roger Warren and expert (BPW) depositions, 30b6 deposition (2.1.16 and 2.3.16).	Martinez	0.1	\$100.00	\$10.00	
1/27/2016	Email Desmond Ellis additional contact details for getting in touch with ML and SRICH, and travel information again for his convenience.	Martinez	0.1	\$100.00	\$10.00	
1/27/2016	Email correspondence to SRICH and JK about a couple of documents not found from additional list from Nexsen Pruett (additional emails and other docs sent between opposing counsel and expert BPW)	Martinez	0.1	\$100.00	\$10.00	
1/27/2016	Email correspondence from Sarah about new additional document searching project re emails between opposing counsel and expert B Perry Woodside.	Martinez	0.1	\$100.00	\$10.00	
1/27/2016	Searched for additional email documents between opposing counsel and expert re preparation of expert report.	Martinez	1	\$100.00	\$100.00	
1/27/2016	Reviewed and downloaded Desmond's personnel file. Merged into one PDF document and sent to ML in prep for defending deposition.	Martinez	0.7	\$100.00	\$70.00	
1/27/2016	Email correspondence with ML about preparing Desmond's personnel file.	Martinez	0.1	\$100.00	\$10.00	
1/28/2016	Finished making copies and started separating the two copies of each document into exhibit binders.	Martinez	2	\$100.00	\$200.00	
1/29/2016	Reviewed BPW expert deposition binders to make sure all the correct exhibits were inside (by reviewing the bates numbers).	Martinez	0.3	\$100.00	\$30.00	
1/29/2016	Finished putting copies of the exhibit documents for the expert deposition of B Perry Woodside into binders.	Martinez	0.2	\$100.00	\$20.00	
2/1/2016	Saved scanned PDFs of returned collective action notice mailings.	Martinez	0.1	\$100.00	\$10.00	
2/1/2016	Saved email correspondence with Desmond and court reporters from these past weeks.	Martinez	0.2	\$100.00	\$20.00	
2/1/2016	Answered opt-in client's question about whether Kiawah is responsible for visa costs (voucher).	Martinez	0.1	\$100.00	\$10.00	
2/1/2016	Opened and scanned returned opt-in mailings from Jamaica.	Martinez	0.2	\$100.00	\$20.00	
2/1/2016	Called Sabrina, court reporter for FLECTS depositions, to acquire exhibit list of class members for Kiawah 30b6 depo. Saved attachments to legal server and sent to JK and SRICH via email.	Martinez	0.2	\$100.00	\$20.00	
2/9/2016	Email correspondence with ML, SRICH about location of Tibbetts original deposition transcript.	Martinez	0.2	\$100.00	\$20.00	
2/9/2016	Prepared UPS package to AWR & associates to send them original Tibbetts deposition transcript.	Martinez	0.57	\$100.00	\$57.00	

Date	Description	Staff	Dur/Qty	Proposed Rate	Amount	Notes
2/9/2016	Prepared cover letter for Tibbets original transcript package to be sent to AWR.	Martinez	0.1	\$100.00	\$10.00	
2/12/2016	Email correspondence with SRICH and JK regarding the missing Wells exhibits.	Martinez	0.1	\$100.00	\$10.00	
2/12/2016	Filled out check request form for payment of court reporting and deposition transcripts for Wells and Hobbs depositions.	Martinez	0.2	\$100.00	\$20.00	
2/12/2016	Email correspondence with Sabrina Beauvais, Florida court reporter, regarding Wells and Hobbs deposition transcripts.	Martinez	0.1	\$100.00	\$10.00	
2/12/2016	Email correspondence with SRICH regarding total amount of pages in exhibit prepared for BPW deposition.	Martinez	0.1	\$100.00	\$10.00	
3/3/2016	Organizing and filing deposition transcripts.	Martinez	0.33	\$100.00	\$33.00	
3/7/2016	Conversation with E. Moodie re: mediation on Friday 3/11	Martinez	0.1	\$100.00	\$10.00	
3/7/2016	Left voicemail with E. Moodie asking him to call me back to discuss Friday's (3/11) mediation.	Martinez	0.1	\$100.00	\$10.00	
3/7/2016	Wrote message to leading plaintiffs K. Ennis Collins and R. Fisher regarding availability this Friday for mediation updates.	Martinez	0.1	\$100.00	\$10.00	
3/7/2016	Whatsapp and text messages to named plaintiffs K. Collins-Ennis, D. Ellis, and R. Martin re: availability for mediation updates on Friday 3/11	Martinez	0.1	\$100.00	\$10.00	
3/9/2016	Message to R. Fisher asking him to call me back ASAP to communicate with him Kiawah's 3/9 settlement offer	Martinez	0.1	\$100.00	\$10.00	
3/9/2016	Conversation with D. Ellis regarding Kiawah's 3/9 settlement offer	Martinez	0.1	\$100.00	\$10.00	
3/9/2016	Call to K. Collins-Ennis regarding Kiawah's 3/9 settlement offer	Martinez	0.1	\$100.00	\$10.00	
3/9/2016	Discussion with J. Knoepp, S. Rich, and D. Werner about Kiawah settlement offer and advice to leading plaintiff clients.	Martinez	0.3	\$100.00	\$30.00	
3/24/2016	Phone conversation with E. Moodie today about updates since settlement.	Martinez	0.1	\$100.00	\$10.00	